

JUDGE FRANK MONTALVO

FILED

2019 FEB 20 PM 2:51

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAUL VALDIVIA,
aka "Puppet"

Defendant.

§ CRIMINAL NO. EP-19-CR-

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INDICTMENT

CT 1: 18 U.S.C. §§ 1591(a)(1), (b)(2) & (c)

- Sex Trafficking of a Child

CT 2: 18 U.S.C. § 1594(c) – Conspiracy to

Sex Traffic a Child

EP 19 CR 0459

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1591(a)(1), (b)(2) & (c))

That beginning on or about March 18, 2016 and continuing through on or about April 18, 2016, in the Western District of Texas and elsewhere, Defendant,

SAUL VALDIVIA, aka "Puppet",

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, provide, advertise, maintain and solicit by any means, a person, V.C., knowing and in reckless disregard of the fact that V.C. had not attained the age of 18 years and after having had a reasonable opportunity to observe V.C., and knowing and in reckless disregard that V.C. would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c).

COUNT TWO

(18 U.S.C. § 1594(c))

That beginning on or about March 18, 2016 and continuing through on or about April 18, 2016, in the Western District of Texas and elsewhere, Defendant,

SAUL VALDIVIA, aka "Puppet",

in and affecting interstate and foreign commerce, knowingly conspired, combined, confederated and agreed with others, known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means, a person, V.C., knowing and in reckless disregard of the fact that V.C. had not attained the age of 18 years and after having had a reasonable opportunity to observe V.C., and knowing and in reckless disregard that V.C. would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c), all in violation of Title 18, United States Code, Section 1594(c).

A TRUE BILL
~~ORIGINAL SIGNATURE~~
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: 
Assistant United States Attorney